

Exhibit B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

DALE VAUGHN, on behalf of himself and §
on behalf of all others similarly situated, §

Plaintiff, §

v. §

WINGO SERVICE COMPANY, INC., §

Defendant. §

CIVIL ACTION NO. 4:20-cv-03915

DECLARATION OF BEATRIZ SOSA-MORRIS

The Undersigned declares as follows:

1. My name is Beatriz Sosa-Morris. I am over the age of twenty-one years, of sound mind, and competent to make this affidavit. I swear under penalty of perjury that the facts stated within this declaration are within my personal knowledge and are true and correct.
2. I am a founding partner of Sosa-Morris Neuman, PLLC. I have been licensed for over eleven years. I am an attorney in good standing admitted to practice in the State of Texas and in the State of Georgia. Additionally, I am admitted into the following federal courts: Fifth Circuit Court of Appeals, Southern District of Texas, Western District of Texas, Eastern District of Texas, Northern District of Texas, and the District of Colorado. In my career, I have also been admitted *pro hac vice* in numerous other federal districts including the Eastern District of Louisiana, Western District of Louisiana, the District of Arizona, Western District of Oklahoma, Southern District of Florida and other courts.
3. Throughout my career, I have litigated many aspects of Fair Labor Standards Act ("FLSA"), including but not limited to, misclassification issues, exemptions, waivers, arbitration agreements, class waivers, representative discovery, overtime calculations, tip credit, good faith, willfulness, fluctuating workweeks, Motor Carrier Act, Equal Pay Act, and FLSA damages. I have represented employees in FLSA matters for over nine years. I have settled millions of dollars in FLSA claims both on an individual basis and on behalf of a class and collective. I have presented oral argument before the Fifth Circuit on novel FLSA exemption issues. I have also prevailed on numerous issues including but not limited to:

conditional certification motions, on issues of representative discovery, on the application of exemptions, in misclassification cases, in off the clock claims, on FLSA waivers, in tip credit application cases, on good faith defenses, and on willfulness. I have deposed numerous corporate representatives pursuant to Fed. R. Civ. P. 30(b)6, presented numerous FLSA settlements for approval, prevailed in invalidating a class waiver, and prevailed in opposing motions to compel arbitration. Moreover, I have also litigated FLSA cases in arbitration before the AAA, JAMS, and with private arbitrators. I have also assisted clients with their charges filed with the National Labor Relations Board (“NLRB”) regarding class waivers.

4. Altogether, the legal practice of the attorneys at Sosa-Morris Neuman, PLLC for the last five plus years has been at least 80% FLSA litigation and most of that has involved cases litigated on a collective basis brought in district courts across the country. My firm has recovered millions in unpaid wages for thousands of workers across the country.
5. Sosa-Morris Neuman, PLLC keeps contemporaneous records of the time attorneys work on cases. Our fees are attached as Exhibit 1. It is my professional opinion that the work performed and the rates charged were reasonable considering the venue of this case and the issues involved. The total attorneys’ fees incurred in this litigation to date are \$168,750.
6. Prior to filing the Complaint, myself, and my law partner John Neuman spent hours interviewing the Plaintiff, researching the Defendant, investigating the veracity of Plaintiff’s allegations, reviewing documents provided by Plaintiff, researching the law as it applies to Defendant’s compensation system, reviewing PACER filings for any prior cases against Defendant or its management, and drafting the complaint. This is the first time Sosa-Morris Neuman, PLLC has represented Mr. Dale Vaughn or sued Defendant Wingo Service Company, Inc.
7. The costs incurred in this litigation were reasonable and necessary. Those costs include the \$400 filing fee issued to the clerk at the beginning of this case, \$1,617.90 for the deposition of Mr. Wingo, and \$715 in copying and printing expenses. Throughout the court of this litigation, Plaintiff’s counsel was required to print approximately 3600 pages, primarily constituting the exhibit binders for trial and Plaintiff’s pay and time records when our staff was tasked with data entry for the damage model. Based on my research, \$.20 per page is a reasonable reimbursement for black and white printing. *See Canion v. United States*, No. EP-03-CA-0347-FM, 2005 U.S. Dist. LEXIS 21265, 2005 WL 2216881, at *4 (W.D. Tex. Sept. 9, 2005); *see also Zenith Elect. Corp. v. WH-TV Broad. Corp.*, No. 01 C 4366, 2004 U.S. Dist. LEXIS 13657, 2004 WL 1631676, at *4

(N.D. Ill. July 19, 2004) (finding copy rate of \$ 0.20 reasonable). The filing fee is reflected on the docket sheet. The bill for the deposition transcript is attached as Exhibit 2.

8. As shown in Exhibit 1, Sosa-Morris Neuman spent over 350 hours litigating this matter. Please note that this accounting of time does not include time not yet incurred for further briefing, attendance at hearings or any other anticipated work performed in this matter. In addition to the hours described above. Exhibit 1 also does not capture the entirety of billable time my firm required to resolve this case. It omits a number of interoffice conference and tasks that I judged to be clerical in nature. I approximate the omitted time to be 20 hours. Moreover, we used billing judgment to delete 5 hours of attorney time due to their duplicate nature.
9. The hourly rates and fees charged by myself and my law partner, John Neuman are more than reasonable for FLSA counsel. Attorney time on this case was billed at \$500 an hour. In my professional opinion, the time and billing submissions compiled in this case are reasonable, necessary, and reflect the use of billing discretion. Additionally, the hourly rates are commensurate with the lawyers' levels of experience. I further suggest that the hourly rates used are consistent with the "Laffey Matrix" used by many district courts to assess the reasonableness of attorneys' fees. See www.laffeymatrix.com/see.html (billing rate of \$672 for an 8 to 10 year lawyer). This hourly rate is also supported by the Nation Law Journal's survey, which places partner billing rates at a \$655 per hour average.
10. The rate of \$500 per hour is well within the range approved by other courts in this district, as the following cases demonstrate:
 - *Valdepena v. Nuestro Sagardo Corazon Primary Home CARE Inc.*, No. 5:19-CV-94, 2022 U.S. Dist. LEXIS 192863, at *5-6 (S.D. Tex. Sep. 15, 2022) (approving rates of \$500 per hour)
 - *Carranza v. Cirlos*, No. 2:18-cv-419, 2020 U.S. Dist. LEXIS 147902, at *2-3 (S.D. Tex. May 11, 2020) (\$500 hourly rate is reasonable)
 - *Novick v. Shipcom Wireless, Inc.*, No. 4:16-CV-00730, 2018 U.S. Dist. LEXIS 198446, at *7 (S.D. Tex. Nov. 21, 2018) (approving a \$500 hourly rate for work on an FLSA case)
 - *Rouse v. Target Corp.*, 181 F. Supp. 3d 379, 385 (S.D. Tex. 2016) (finding that "500 per hour is a reasonable hourly rate" for work on an FLSA case).
 - *In re Wells Fargo Wage and Hour Employment Practices Litigation (No. III)*, Case No. 4:11-md-2266 [Docs. 233-4, 239] (approving a \$550 hourly rate)

- *Vela v. M&G USA Corporation*, 2020 U.S. Dist. LEXIS 12649, at *4 (S.D. Tex. Jan. 27, 2020) (approving rates of both \$450 and \$500 an hour for wage and hour matter)
- *Miller v. Raytheon Co.*, 716 F.3d 138, 149 (5th Cir. 2013) (upholding that “hourly rates of \$577.50, \$542.50, and \$280 were reasonable, customary rates” in an ADEA case)

11. My firm cannot accept every case that is offered to it due to limited resources. We have rejected cases due to our current case load. Currently, we have over forty cases in various stages of litigation. Therefore, because my firm worked on this case on a contingency basis, we were not able to work on other cases or take on some cases. My firm incurred a risk of not being paid at all on this case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed on January 4, 2023

/s/Beatriz Sosa-Morris

Beatriz Sosa-Morris

Exhibit 1

	Date	Time	Billor	Rate	Total	Description
1	10/29/2020	1.9	Clerk	\$ 75.00	\$ 142.50	Reviewed Vaughn's timesheets and checks to reconcile logged hours with spreadsheet. Prepared notes as to how overtime was misclassified in timesheets and/or checks
2	10/30/2020	1.5	Clerk	\$ 75.00	\$ 112.50	Continued reviewing timesheets and checks, and generated notes for how overtime was misclassified, as well as any other discrepancies
3	11/2/2020	1.2	Clerk	\$ 75.00	\$ 90.00	Continued placing notes in spreadsheet based on Vaughn's timesheets, checks, and notes. Began calculating missing overtime
4	11/3/2020	1.5	Clerk	\$ 75.00	\$ 112.50	Continued calculating overtime and inputting relevant notes to spreadsheet
5	11/4/2020	0.7	Clerk	\$ 75.00	\$ 52.50	Entered information for double time and calculated overtime for those timesheets with double time and corresponding checks
6	11/5/2020	1	Clerk	\$ 75.00	\$ 75.00	Calculated overtime owed for pay periods without checks, based on extrapolation
7	11/9/2020	0.5	Clerk	\$ 75.00	\$ 37.50	Finished calculating overtime owed for pay periods without checks, based on extrapolation. Reviewed work
8	11/13/2020	1.3	BSM	\$ 500.00	\$ 650.00	Intake call with PC, research company
9	11/16/2020	1.8	BSM	\$ 500.00	\$ 900.00	Review Vaughns records, damage calculation provided by IS
10	11/17/2020	0.5	BSM	\$ 500.00	\$ 250.00	review case file; emailed client re: case specifics, case status
11	11/17/2020	1	BSM	\$ 500.00	\$ 500.00	Review complaint
12	11/17/2020	2.5	JN	\$ 500.00	\$ 1,250.00	Draft complaint, coversheet, summons, file
13	11/18/2020	0.3	JN	\$ 500.00	\$ 150.00	Send summons to server, calendar deadlines on order for conf
14	11/19/2020	0.7	JN	\$ 500.00	\$ 350.00	Draft and file NOA/COIP
15	11/20/2020	0.5	JN	\$ 500.00	\$ 250.00	TC with Vaughn re status, need for records
16	11/20/2020	1	BSM	\$ 500.00	\$ 500.00	sent Client Defendant's answer, gave client case update; reviewed file for supporting documents needed (.3)
17	11/23/2020	0.3	JN	\$ 500.00	\$ 150.00	Review and receipt of summons, calendar answer deadline
18	12/11/2020	0.4	JN	\$ 500.00	\$ 200.00	Review answer, research defendant's counsel
19	12/11/2020	0.5	BSM	\$ 500.00	\$ 250.00	review Answer to Complaint; review firm representing Defendant
20	12/11/2020	0.5	BSM	\$ 500.00	\$ 250.00	met with JN re: case strategy, reviewed Defendant's answer
21	1/8/2021	1.5	BSM	\$ 500.00	\$ 750.00	Call with Vaughn re disclosures, draft disclosures
22	1/11/2021	2.3	JN	\$ 500.00	\$ 1,150.00	Revise FLSA disclsoures, compile Vaughn 1-182 for production
23	1/14/2021	3	JN	\$ 500.00	\$ 1,500.00	Review records produced by Wingo with disclosures
24	1/18/2021	3.2	BSM	\$ 500.00	\$ 1,600.00	Create damage model using Wingo's records
25	3/10/2021	0.2	BSM	\$ 500.00	\$ 100.00	sent email to opposing counsel with a draft Joint discovery case management plan
26	3/10/2021	1	BSM	\$ 500.00	\$ 500.00	review case file; reviewed disclosure documents;
27	3/10/2021	1	JN	\$ 500.00	\$ 500.00	Draft JDCMP
28	3/11/2021	0.1	BSM	\$ 500.00	\$ 50.00	emailed opposing counsel re: setting up Joint conference call
29	3/12/2021	0.2	BSM	\$ 500.00	\$ 100.00	call with opposing counsel re: case management plan

	Date	Time	Billor	Rate	Total	Description
30	3/12/2021	0.5	BSM	\$ 500.00	\$ 250.00	reviewed case; edited JDCMP; sent email to opposing counsel re: edit.
31	3/25/2021	0.1	BSM	\$ 500.00	\$ 50.00	emailed discovery request to defendant
32	3/25/2021	0.5	JN	\$ 500.00	\$ 250.00	Review discovery to Wingo
33	3/25/2021	2.8	BSM	\$ 500.00	\$ 1,400.00	Draft ROGS, RFPs, RFAs to Wingo
34	4/2/2021	0.3	BSM	\$ 500.00	\$ 150.00	call with Vaughn re update on case
35	4/26/2021	0.1	BSM	\$ 500.00	\$ 50.00	signed and returned R. 11 agreement
36	4/26/2021	1	BSM	\$ 500.00	\$ 500.00	review case file (.3); spoke to client re: discovery answers needed
37	4/26/2021	1	JN	\$ 500.00	\$ 500.00	Review Wingo's discovery responses
38	4/27/2021	0.3	BSM	\$ 500.00	\$ 150.00	edited and emailed to opposing counsel Proposed stipulation for Protective Order
39	4/27/2021	1	BSM	\$ 500.00	\$ 500.00	review defendant's paystubs; created excel format to input data
40	4/27/2021	1.5	BSM	\$ 500.00	\$ 750.00	review file (1.2) and drafted discovery to be sent to Defendant's (P's second set of ROGS); emailed to defendants (.1).
41	4/28/2021	0.1	BSM	\$ 500.00	\$ 50.00	sent email to opposing counsel with interrogatories in word doc per their request
42	4/28/2021	0.2	BSM	\$ 500.00	\$ 100.00	email correspondence with client re: evidence; bonuses received
43	4/28/2021	1	BSM	\$ 500.00	\$ 500.00	review pay records, documents, and other evidence regarding pay and hours worked
44	4/30/2021	0.4	BSM	\$ 500.00	\$ 200.00	review Protective order (.2); sent email response to defendant
45	4/30/2021	4	BSM	\$ 500.00	\$ 2,000.00	Format damage model, draft demand letter
46	5/3/2021	1	JN	\$ 500.00	\$ 500.00	Revise demand letter; review damage model
47	5/4/2021	1.9	JN	\$ 500.00	\$ 950.00	Review additional documents produced by Wingo
48	5/10/2021	0.2	BSM	\$ 500.00	\$ 100.00	email correspondence with client re: case status and discovery responses
49	5/11/2021	0.3	JN	\$ 500.00	\$ 150.00	status call with Vaughn
50	5/28/2021	0.2	BSM	\$ 500.00	\$ 100.00	reviewed D's Objections to P's second set of Rogs
51	7/13/2021	0.8	JN	\$ 500.00	\$ 400.00	Draft corporate rep depo notice
52	7/14/2021	0.3	BSM	\$ 500.00	\$ 150.00	Revise Rule 30(b)(6) notice
53	7/22/2021	0.7	JN	\$ 500.00	\$ 350.00	Draft expert disclosures
54	8/27/2021	7	JN	\$ 500.00	\$ 3,500.00	Prepare for corporate rep depo
55	10/7/2021	3	JN	\$ 500.00	\$ 1,500.00	Prepare for Client's depo
56	10/8/2021	0.5	BSM	\$ 500.00	\$ 250.00	discussed corp. rep. depo with JN
57	10/8/2021	5.5	JN	\$ 500.00	\$ 2,750.00	Prepare for corporate rep depo
58	10/10/2021	1	BSM	\$ 500.00	\$ 500.00	review Helix opinion; discussed with JN
59	10/12/2021	0.1	JN	\$ 500.00	\$ 50.00	receive email cancelling client Vaughn's depo
60	10/12/2021	9	JN	\$ 500.00	\$ 4,500.00	continue depo prep, take corp rep depo
61	10/19/2021	0.5	BSM	\$ 500.00	\$ 250.00	review/revise demand letter
62	10/19/2021	2	JN	\$ 500.00	\$ 1,000.00	Draft second demand letter
63	12/9/2021	3.2	JN	\$ 500.00	\$ 1,600.00	Review deposition of Wingo

	Date	Time	Billor	Rate	Total	Description
64	12/15/2021	5	JN	\$ 500.00	\$ 2,500.00	Draft MSJ
65	12/16/2021	3.5		\$ 400.00	\$ 1,400.00	legal research on exemptions applicable to this case
66	12/30/2021	8	JN	\$ 500.00	\$ 4,000.00	Cont. work on MSJ
67	12/31/2021	6	JN	\$ 500.00	\$ 3,000.00	Continue work on MSJ
68	1/3/2022	5.5	BSM	\$ 500.00	\$ 2,750.00	review/edit MSJ
69	1/3/2022	8.2	JN	\$ 500.00	\$ 4,100.00	Finalize and file MSJ
70	1/25/2022	2.4	JN	\$ 500.00	\$ 1,200.00	Review MSJ response, read cases cited by Defendant
71	1/27/2022	4	BSM	\$ 500.00	\$ 2,000.00	review/edit MSJ reply
72	1/27/2022	6	JN	\$ 500.00	\$ 3,000.00	Draft MSJ reply
73	1/28/2022	4.5	JN	\$ 500.00	\$ 2,250.00	Revise and file MSJ reply
74	5/16/2022	0.1	BSM	\$ 500.00	\$ 50.00	review notice of setting status conference
75	5/23/2022	0.1	BSM	\$ 500.00	\$ 50.00	review zoom invite for status conference
76	5/23/2022	4.5	JN	\$ 500.00	\$ 2,250.00	Review MSJ filings for status conference; prepared to argue motion
77	5/24/2022	1	JN	\$ 500.00	\$ 500.00	prepared for and attended status conference
78	5/25/2022	0.5	BSM	\$ 500.00	\$ 250.00	review order for mediation; spoke to JN re: case status
79	5/27/2022	0.1	BSM	\$ 500.00	\$ 50.00	review order setting mediation
80	6/1/2022	5	JN	\$ 500.00	\$ 2,500.00	Update damage model, create week by week ratio calculations
81	6/2/2022	3	JN	\$ 500.00	\$ 1,500.00	Prep for and attend Premediation meeting
82	6/8/2022	0.1	BSM	\$ 500.00	\$ 50.00	review notice of cancelling mediation
83	6/10/2022	0.1	BSM	\$ 500.00	\$ 50.00	review notice of setting mediation
84	6/14/2022	2	JN	\$ 500.00	\$ 1,000.00	prepared for mediation
85	6/16/2022	5	JN	\$ 500.00	\$ 2,500.00	mediation
86	6/21/2022	0.1	BSM	\$ 500.00	\$ 50.00	review emails from opposing counsel to judge re: cost of mediation
87	6/23/2022	2	BSM	\$ 500.00	\$ 1,000.00	review/revise/draft Joint pretrial order draft
88	6/28/2022	2	BSM	\$ 500.00	\$ 1,000.00	review/edit/draft jury instructions and vd questions draft
89	6/29/2022	0.2	BSM	\$ 500.00	\$ 100.00	review order setting conferences and calendared
90	8/5/2022	0.5	BSM	\$ 500.00	\$ 250.00	review order granting MSJ
91	8/5/2022	0.5	JN	\$ 500.00	\$ 250.00	review order granting MSJ
92	8/8/2022	0.1	JN	\$ 500.00	\$ 50.00	emailed opposing counsel re: setting up a call re: settlement
93	8/8/2022	0.2	BSM	\$ 500.00	\$ 100.00	review case file/ met with JN re: case status
94	8/29/2022	0.1	JN	\$ 500.00	\$ 50.00	emailed opposing counsel re: setting up a call re: case
95	9/7/2022	0.2	BSM	\$ 500.00	\$ 100.00	review case file/ met with JN re: case status
96	9/7/2022	0.2	JN	\$ 500.00	\$ 100.00	discussed with BSM call with opposing counsel re: settlement
97	9/15/2022	0.1	BSM	\$ 500.00	\$ 50.00	review order adopting RR
98	9/15/2022	1	BSM	\$ 500.00	\$ 500.00	review case file (.3); review order from Court granting summary Judgement (.1); spoke with JN re case file and settlement possibility
99	9/22/2022	8	JN	\$ 500.00	\$ 4,000.00	draft P's proposed jury charge, P's witness list, P's exhibit list, P's proposed VD questions, pretrial order, extensive review of file

	Date	Time	Biller	Rate	Total	Description
100	9/26/2022	1	BSM	\$ 500.00	\$ 500.00	review/edit Joint Pretiral Order
101	9/26/2022	3	JN	\$ 500.00	\$ 1,500.00	draft/edit Joint pretrial order; review case and MSJ order for stipulations
102	9/27/2022	0.2	JN	\$ 500.00	\$ 100.00	sent email to opposing counsel re: joint pretrial and bench trial
103	9/27/2022	1	BSM	\$ 500.00	\$ 500.00	review/ edit Joint pretrial order
104	9/28/2022	3	BSM	\$ 500.00	\$ 1,500.00	review/revised P's proposed jury charge, P's witness list, P's exhibit list
105	9/29/2022	0.5	JN	\$ 500.00	\$ 250.00	review Joint pretrial Order and emailed opposing counsel re: concerns
106	9/30/2022	0.5	BSM	\$ 500.00	\$ 250.00	call with defense counsel re: joint pretrial order
107	9/30/2022	0.5	JN	\$ 500.00	\$ 250.00	call with defense counsel re: joint pretrial order
108	9/30/2022	1	BSM	\$ 500.00	\$ 500.00	review/edit Joint Pretiral Order and edits from opposing counsel
109	9/30/2022	1	JN	\$ 500.00	\$ 500.00	review/edit Joint Pretiral Order; emailed opposing counsel the edits
110	9/30/2022	3	JN	\$ 500.00	\$ 1,500.00	review/edit Motion in Liminie. Review case law re: weekly review of the FLSA, and credits to overtime wages
111	9/30/2022	4	BSM	\$ 500.00	\$ 2,000.00	review/edit Motion in Liminie. Review case law re: weekly review of the FLSA, and credits to overtime wages
112	10/7/2022	0.1	BSM	\$ 500.00	\$ 50.00	reviewed defense counsel's pretrial disclosures.
113	10/7/2022	0.4	JN	\$ 500.00	\$ 200.00	draft P's pretrial disclosures; sent to dendants
114	10/11/2022	0.1	JN	\$ 500.00	\$ 50.00	emailed opposing counsel re: bench trial
115	10/11/2022	0.2	BSM	\$ 500.00	\$ 100.00	met with JN re: case status, bench trial selection,
116	10/18/2022	0.1	BSM	\$ 500.00	\$ 50.00	emailed opposing counsel re: errors found in their damage model
117	10/18/2022	1	BSM	\$ 500.00	\$ 500.00	met with JN re: damage model, case strategy
118	10/18/2022	3	BSM	\$ 500.00	\$ 1,500.00	reviewed and compared Plaintiff and Defendant's damage model; reviewed corresponding time sheets
119	10/24/2022	0.2	BSM	\$ 500.00	\$ 100.00	review case file and upcoming deadlines in the case
120	10/25/2022	0.1	JN	\$ 500.00	\$ 50.00	draft and file Notice of Non-opposition
121	10/25/2022	0.1	BSM	\$ 500.00	\$ 50.00	emailed opposing counsel and set up phone call re: damage model, exhibits, and bench trial
122	10/26/2022	0.1	JN	\$ 500.00	\$ 50.00	email with opposing counsel re: if they are agreeable to our exhibits
123	10/26/2022	0.1	BSM	\$ 500.00	\$ 50.00	reviewed emails from court and opposing counsel re: exhibits and pre-trial hearing Monday
124	10/26/2022	0.1	BSM	\$ 500.00	\$ 50.00	draft Proposed Order for Mtn. in Limine
125	10/26/2022	0.3	BSM	\$ 500.00	\$ 150.00	call with Defense counsel regarding exhbits, damage model, and bench trial possibility
126	10/26/2022	0.3	JN	\$ 500.00	\$ 150.00	call with Defense counsel regarding exhbits, damage model, and bench trial possibility
127	10/26/2022	1	BSM	\$ 500.00	\$ 500.00	meeting with JN re case strategy, jury trial, voir dire, and pre-trial hearing prep.
128	10/26/2022	1	JN	\$ 500.00	\$ 500.00	meeting with BSM re case strategy, jury trial, voir dire, and pre-trial hearing prep.
129	10/27/2022	0.1	BSM	\$ 500.00	\$ 50.00	reviewed fee report

	Date	Time	Biller	Rate	Total	Description
130	10/27/2022	0.2	JN	\$ 500.00	\$ 100.00	reviewed email by opposing counsel re: exhibit objections; sent email to opposing counsel re: our position regarding the exhibits
131	10/27/2022	0.2	JN	\$ 500.00	\$ 100.00	review and sent email regarding joint exhibits to opposing counsel
132	10/27/2022	0.5	BSM	\$ 500.00	\$ 250.00	Review exhibits that Defendant did not want to include in the Joint exhibit list (.3); discussed with JN (.2)
133	10/27/2022	2	BSM	\$ 500.00	\$ 1,000.00	Prepare for trial reviewing case file; reviewed case law regarding willfulness and good faith
134	10/28/2022	0.1	JN	\$ 500.00	\$ 50.00	updated opposing counsel re: exhibits sent to courthouse
135	10/30/2022	0.2	BSM	\$ 500.00	\$ 100.00	discussed case with JN re: R&R objections and deadlines regarding MSJ
136	10/31/2022	0.1	JN	\$ 500.00	\$ 50.00	reviewed email from opposing counsel responded by emailing opposing counsel: regarding exhibits
137	10/31/2022	4	JN	\$ 500.00	\$ 2,000.00	prep for, travel, to and attend pretrial conference
138	11/3/2022	4	BSM	\$ 500.00	\$ 2,000.00	prep for trial including closing power point
139	11/3/2022	4.4	JN	\$ 500.00	\$ 2,200.00	draft damages brief on the availability of set offs
140	11/4/2022	0.5	JN	\$ 500.00	\$ 250.00	review D's damage brief
141	11/4/2022	3	BSM	\$ 500.00	\$ 1,500.00	review/revise P's damages brief
142	11/4/2022	3	JN	\$ 500.00	\$ 1,500.00	meeting with client for trial prep
143	11/4/2022	3	BSM	\$ 500.00	\$ 1,500.00	meeting with client for trial prep
144	11/4/2022	3.5	BSM	\$ 500.00	\$ 1,750.00	review D's damage calculation brief, pull records for each week they identified; compared two damage briefs line by line
145	11/5/2022	2	JN	\$ 500.00	\$ 1,000.00	draft and file trial brief response to D's brief on damages
146	11/5/2022	4.1	JN	\$ 500.00	\$ 2,050.00	trial prep, witness outlines, exhibit review, draft opening
147	11/6/2022	1	BSM	\$ 500.00	\$ 500.00	Review/revise P's response to D's brief on damages
148	11/6/2022	5	JN	\$ 500.00	\$ 2,500.00	trial prep, file review, draft witness outlines
149	11/6/2022	6.4	BSM	\$ 500.00	\$ 3,200.00	prepare for trial including reviewing file, communication with client, drafting power point closing
150	11/7/2022	2	BSM	\$ 500.00	\$ 1,000.00	Travel to and attend pretrial conference
151	11/7/2022	2	JN	\$ 500.00	\$ 1,000.00	pretrial conference, travel and attend
152	11/7/2022	8	BSM	\$ 500.00	\$ 4,000.00	trial prep including: draft closing(3), communicating with client (1), reviewing file (2), preparing questions for cross and presenting client (2)
153	11/7/2022	9	JN	\$ 500.00	\$ 4,500.00	work on trial prep
154	11/8/2022	12	JN	\$ 500.00	\$ 6,000.00	First day of trial (prepared for and attended)
155	11/8/2022	12	BSM	\$ 500.00	\$ 6,000.00	perpared for and attend 1st day of Trial, conducted voir dire; met with client
156	11/9/2022	0.2	JN	\$ 500.00	\$ 100.00	receipt and review post trial filings
157	11/9/2022	0.2	BSM	\$ 500.00	\$ 100.00	reviewed jury verdict and jury note, cert. of trial exhibits; misc. filings post trial
158	11/9/2022	10	JN	\$ 500.00	\$ 5,000.00	prepared for and attended Trial

	Date	Time	Billor	Rate	Total	Description
159	11/9/2022	10	BSM	\$ 500.00	\$ 5,000.00	prepared for and attended Trial, crossed witness, closing, argued motion for directed verdict; met with client after verdict (.5)
160	11/15/2022	0.1	JN	\$ 500.00	\$ 50.00	emailed opposing counsel re: agreement on pre-liquidated 3 year number of \$39,153
161	11/16/2022	0.2	BSM	\$ 500.00	\$ 100.00	discussed case status with JN
162	11/16/2022	2	JN	\$ 500.00	\$ 1,000.00	research for motion for entry of judgment
163	11/17/2022	0.1	JN	\$ 500.00	\$ 50.00	emailed opposing counsel to get an agreement on unpaid overtime figures
164	11/17/2022	2.5	JN	\$ 500.00	\$ 1,250.00	draft motion for entry of judgment
165	11/21/2022	0.5	BSM	\$ 500.00	\$ 250.00	revise/draft motion for entry of judgment
166	11/22/2022	0.2	BSM	\$ 500.00	\$ 100.00	discussed case status with JN
167	11/23/2022	0.2	BSM	\$ 500.00	\$ 100.00	communicated with client re: case status
168	12/6/2022	0.2	BSM	\$ 500.00	\$ 100.00	communicated with client re: case status
169	12/7/2022	0.1	BSM	\$ 500.00	\$ 50.00	reviewed notice of non-opposition
170	12/7/2022	0.4	JN	\$ 500.00	\$ 200.00	draft and file Notice of Non-opposition for motion for entry of judgment
171	12/7/2022	0.5	BSM	\$ 500.00	\$ 250.00	reviewed D's Motion for Directed Verdict
172	12/8/2022	0.9	JN	\$ 500.00	\$ 450.00	receipt and review of d's motion for directed verdict
173	12/12/2022	2.5	JN	\$ 500.00	\$ 1,250.00	research and draft response to Rule 50 motion
174	12/15/2022	3	JN	\$ 500.00	\$ 1,500.00	draft response to motion for directed verdict
175	12/19/2022	5.6	BSM	\$ 500.00	\$ 2,800.00	revise and research for response to D's motion for judgment as a matter of law
176	12/20/2022	0.2	BSM	\$ 500.00	\$ 100.00	review response in opposition to entry of judgment filed by Defendants and double checked deadlines
177	12/20/2022	0.3	BSM	\$ 500.00	\$ 150.00	reviewed Court's Final Judgment; reviewed order granting Motion for judgment; reviewed order denying motion for directed verdict
178	12/20/2022	2.5	JN	\$ 500.00	\$ 1,250.00	revise and edit P's Response in opposition to Directed Verdict pursuant to rules
179	12/21/2022	0.5	JN	\$ 500.00	\$ 250.00	review judgment and order denying directed verdict, calender deadline for fees
180	12/23/2022	0.1	BSM	\$ 500.00	\$ 50.00	emailed opposing counsel re: payment to Vaughn of his OT award; reviewed response
181	12/23/2022	0.5	BSM	\$ 500.00	\$ 250.00	discussed with JN payment of judgment to Vaughn, timelines for appeals, and timelines for motions for fees
182	12/29/2022	4.5	BSM	\$ 500.00	\$ 2,250.00	Draft motion for approval of fees
183	12/30/2022	3.6	JN	\$ 500.00	\$ 1,800.00	Revise motion for approval of fees
184	1/3/2023	0.2	BSM	\$ 500.00	\$ 100.00	emailed client with update about case
185	1/3/2023	0.2	BSM	\$ 500.00	\$ 100.00	discussed case status with JN
186	1/3/2023	6.5	BSM	\$ 500.00	\$ 3,250.00	review and revise Mtn. for approval of fees; including exhibits
Totals		351.6			\$ 171,922.50	
After Redline					\$ 168,750.00	

Exhibit 2

Veritext, LLC - Texas Region

Tel. 800.971.1127 Email: billing-tx@veritext.com
 Fed. Tax ID: 20-3132569



Bill To: John Neuman
 Sosa-Morris Neuman
 5612 Chaucer Drive
 Houston, TX, 77005

Invoice #: 5431103
 Invoice Date: 12/3/2021
 Balance Due: \$1,617.90

Case: Vaughn, Dale v. Wingo Service Company, Inc., (4:20cv03915)

Proceeding Type: Depositions

Job #: 4844103 | Job Date: 10/12/2021 | Delivery: Normal

Location: Houston, TX

Billing Atty: John Neuman

Scheduling Atty: John Neuman | Sosa-Morris Neuman

Witness: Edgar Wingo	Quantity	Price	Amount
Original with 1 Certified Transcript	113.00	\$5.15	\$581.95
Attendance (First Hour)	1.00	\$150.00	\$150.00
Attendance (Add'l Hours)	1.75	\$25.00	\$43.75
Exhibits	44.00	\$0.55	\$24.20
Litigation Package-Secure File Suite	1.00	\$46.00	\$46.00
Administration Fee	1.00	\$62.00	\$62.00
Veritext Exhibit Package (ACE)	1.00	\$45.00	\$45.00
Electronic Delivery and Handling	1.00	\$25.00	\$25.00

	Quantity	Price	Amount
Veritext Virtual Primary Participants	1.00	\$295.00	\$295.00
Exhibit Share	1.00	\$345.00	\$345.00

Notes:	Invoice Total: \$1,617.90 Payment: \$0.00 Credit: \$0.00 Interest: \$0.00 Balance Due: \$1,617.90
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TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult <http://www.veritext.com/services/all-services/services-information>

Pay by Check - Remit to:
 Veritext
 P.O. Box 71303
 Chicago IL 60694-1303
 Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
 A/C Name: Veritext
 Bank Name: BMO Harris Bank
 A/C #: 4353454 ABA: 071000288
 SWIFT: HATRUS44
[Pay by Credit Card: www.veritext.com](http://www.veritext.com)

Invoice #: 5431103
Invoice Date: 12/3/2021
Balance Due: \$1,617.90